

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ADRIAN L. WILLIAMS,

Plaintiff,

vs.

**SOUTHWESTERN BELL TELEPHONE
COMPANY,**

Defendant.

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NO. 3:18-CV-03248-M-BK

DECLARATION OF ARRISSA MEYER

I, Arrissa Meyer, am over the age of 18 and hereby declare under penalty of perjury pursuant to 28 U.S.C. 1746 that the following is true and correct based on personal knowledge:

1. I am a shareholder in the law firm of Littler Mendelson, P.C. (“Littler”), located at 2001 Ross Ave., Suite 1500, Dallas, Texas 75201. I have been hired by Defendant Southwestern Bell Telephone Company as lead counsel in the matter entitled *Adrian L. Williams v. Southwestern Bell Telephone Company*, currently pending in the United States District Court for the Northern District of Texas, Dallas Division.

2. I received a J.D. from Southern Methodist University Dedman School of Law in 2010. During law school, I was a member of Law Review, and I graduated magna cum laude and Order of the Coif (top 10%). Since then, my practice has been exclusively dedicated to labor and employment matters, with a particular focus on matters involving traditional labor law. I am Board Certified in Labor & Employment Law by the Texas Board of Legal Specialization. I was named a Texas Rising Star in 2017-2020.

3. My discounted hourly rate in this matter of \$400 is well below my standard rate and is reasonable for litigation in Texas. I have handled other matters related to disputes similar to this lawsuit, so I am familiar with how to prosecute and defend such matters, and the amount of legal work ordinarily expended in prosecuting and defending such matters. I am further aware of the fees and rates ordinarily and customarily charged in such matters. The rates are reasonable for the type of engagement involved in this case. Littler's depth of experience in this field justifies the rates used for this litigation.

4. Attached to this Affidavit as Exhibit B-1 is a true and correct copy of Littler's pertinent billing records and recorded time in this matter. I am the custodian of records for Exhibit B-1. As a shareholder of Littler, I am familiar with the manner in which its records are created and maintained by virtue of my duties and responsibilities. The billing records and time entries attached to this Declaration are made in the regular course of business by an employee with knowledge of the acts, events, or information contained in them and were made at or near the time of the acts, events, conditions or information appearing in them. Further, it is the regular practice of Littler to keep this type of record in the course of regularly conducted business activity.

5. I have reviewed the billing records of Littler, and based on the facts stated therein, the total fees incurred related to Plaintiff's Motion for Leave to File Amended Pleading are \$5,800. This figure includes, but is not limited to, fees incurred in reviewing Plaintiff's Motion, drafting and preparing SWBT's Opposition and ancillary documents thereto, and legal research and analysis related to SWBT's response. In calculating this figure, I have exercised billing judgment, and have not sought recovery for time entries for which it would not be reasonable to recover from Plaintiff.

6. Based on the factors and other opinions set forth above and my involvement in this case, it is my opinion that the fees and expenses charged by Littler as set forth above, for work performed in connection with this matter are fair, reasonable, and customary for the work done.

Executed in Dallas County, State of Texas, on October 9, 2020.

/s/ Arrissa K. Meyer
Arrissa K. Meyer

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